



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX

75 Hawthorne Street  
San Francisco, CA 94105

OCT - 6 2005

Job Denni  
Landmark Realty  
130 E. Honolulu  
Lindsay, CA 93247

RE: Old Drew Plant  
EPA ID#CASFN0905559

Dear Mr. Denni:

Enclosed is the Abbreviated Preliminary Assessment of the Old Drew Plant site. This report contains the results of an evaluation conducted by Weston Solutions, Inc., for the U.S. Environmental Protection Agency (EPA) under Section 104 of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended [42 U.S.C. 9404], commonly known as Superfund. The purpose of the Preliminary Assessment is to determine whether this site may qualify for placement on the National Priorities List (NPL).

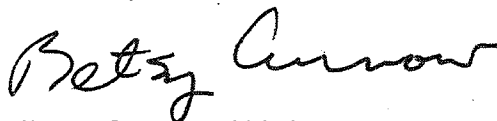
Based on currently available information contained in the enclosed report, EPA has determined that no further assessment is warranted. Although EPA has determined that this site does not qualify for Superfund listing, the State of California may require further assessment or cleanup of this site under State law. You may wish to contact the Department of Toxic Substances Control, Tim Miles, 916/255-3710, for information pertaining to State assessment and cleanup requirements.

Please forward any written comments on the enclosed report to:

Dan McMindes  
Site Assessment Manager  
U.S. Environmental Protection Agency  
75 Hawthorne Street, SFD-9-1  
San Francisco, CA 94105

If you have any questions, please call Dan McMIndes at 415/972-3401.

Sincerely,

A handwritten signature in cursive script, appearing to read "Betsy Curnow".

Betsy Curnow, Chief  
States, Tribes, and Site Assessment Section  
Superfund Division

Enclosure

cc: Anthony Medrano, Central Valley Regional Water Control Board  
Joel Martin, Tulare County Environmental Health Department  
Tim Miles, Department of Toxic Substances Control

EPA ID: CASFN0905559 Site Name: OLD DREW PLANT

State ID: 54-28-0065

Alias Site Names:

City: LINDSAY

County or Parish: TULARE

State: CA

Refer to Report Dated: 08/09/2002

Report Type: PRELIMINARY ASSESSMENT 001

Report Developed by: Roy F. Weston

**DECISION:**

☒ 1. Further Remedial Site Assessment under CERCLA (Superfund) is not required because:

☒ 1a. Site does not qualify for further remedial site assessment under CERCLA (No Further Remedial Action Planned - NFRAP)

☐ 1b. Site may qualify for action, but is deferred to:

☐ 2. Further Assessment Needed Under CERCLA:

2a. Priority: ☐ Higher ☐ Lower

2b. Other: (recommended action)

**DISCUSSION/RATIONALE:**

The site is located on approximately 25 acres and one mile south of the City of Lindsay. Lucas Oil, Malaga Oil Products, Drew Chemicals, Wilsey Foods and Bray Oil Company all occupied the site. Food related products and bleach were manufactured on the site.

The Regional Water Quality Control Board conducted sampling in 1984 from one onsite drinking water well and one offsite well. Although substances were found in groundwater none of them are considered hazardous.

Groundwater is located at a depth of 20 feet below ground surface. There are 35 private drinking water wells and one municipal drinking water well located within 1.5 miles of the site.

The U.S. Environmental Protection Agency (EPA) has determined that no further remedial action by the Federal Superfund program is warranted at the referenced site, at this time. The basis for the no further remedial action planned (NFRAP) determination is provided in the attached document. A NFRAP designation means that no additional remedial steps under the Federal Superfund program will be taken at the site unless new information warranting further Superfund consideration or conditions not previously known to EPA regarding the site are disclosed. In accordance with EPA's decision regarding the tracking of NFRAP sites, the referenced site may be removed from the CERCLIS database and placed in a separate archival database as a historical record if no further Superfund interest is warranted. Archived sites may be returned to the CERCLIS site inventory if new information necessitating further Superfund consideration is discovered.

Site Decision Made by: MCMINDES

Signature: \_\_\_\_\_

Date: 08/22/2005

## **ABBREVIATED PRELIMINARY ASSESSMENT REPORT**

**Submitted To:** Matt Mitguard, EPA Region 9

**Prepared By:** Greg Berner  
Weston Solutions, Inc.

**Site Information:** Old Drew Plant  
Road 220 and Avenue 216  
Lindsay, Tulare County, CA  
Latitude 36° 10' 54" N Longitude 119° 04' 55" W

**Site EPA ID No.** CASFN0905559

**Date:** August 9, 2002

### **1.0 Introduction**

Under the authority of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) and the Superfund Amendments and Reauthorization Act of 1986 (SARA), Weston Solutions, Inc. (WESTON) has been tasked to conduct a Preliminary Assessment (PA) of the Old Drew Plant site, in Lindsay, Tulare County, California. The PA included the review of the information available from federal, state, and local agencies. Using these sources of existing information, the site was evaluated using U.S. Environmental Protection Agency's (EPA's) Hazard Ranking System (HRS) criteria to assess the relative threat associated with actual or potential releases of hazardous substances at the site. This report summarizes the findings of these preliminary investigative activities.

### **2.0 Apparent Problem**

The Old Drew Plant site was identified as a potential hazardous waste site and entered into the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) on January 7, 1999 (1).

The Old Drew Plant site is located approximately 1 mile south of the City of Lindsay, in an agricultural area of Tulare County. The site occupies approximately 25 acres. The Old Drew Plant site began operation as Lucas Oil in the 1930s. The site was later occupied by Malaga Oil Products, Drew Chemicals, Wilsey Foods, and Bray Oil Company. A wide array of Chemicals were manufactured and stored on site from the time of inception until the early 1980s. The specific chemicals manufactured and stored are not identified in the existing files. It is known however that Wilsey Foods manufactured margarines, vegetable oils, water treatment compounds, bleaches and numerous other food related products (2, 3).

In an unknown year, an anonymous informant communicated to the City of Lindsay Fire Department that he was hired to bury 100 55-gallon drums containing a flammable liquid. In the Fall of 1983, nearby residents to the site, who operate private drinking water wells, complained of strange-tasting water to the Tulare County Health Department. Records also indicate that companies operating on site disposed of manufacturing process related liquid and sludge wastes into concrete lined pits and earthen sumps located on the south side of the property. Possible wastes may include, but are not limited to: acids, alkaline substances, asbestos, detergents, heavy metals, hydroxide, oil wastes, soap wastes, and sulfides (2, 4, 5, 6).

In 1984, at the request of the Central Valley Regional Water Quality Control Board (RWQCB), the property owners sampled soil near the concrete waste pits. Soil samples were analyzed for nutrients and metals (including zinc, manganese, iron, and copper). Phosphorus was found in surface soils at a concentration of 131 milligrams per kilogram (mg/kg), while iron was found at 140 mg/kg.

Additionally, the RWQCB collected two surface soil samples and two water samples in 1984; one from the on-site drinking water well and one from an off-site well. Samples were submitted to Radian Corporation and analyzed for volatile organic compounds, semivolatile organic compounds, and total metals. Hexadecanoic acid was found in one soil sample at a concentration of 4,000 mg/kg. Also known as palmitic acid, derived from palm oil, hexadecanoic acid is used in the manufacturing of soaps. According to a Tulare County Health Interoffice Memorandum, a chemical of unknown origin, 2-piperidione, was found at levels of 0.030 milligrams per liter (mg/L) in the on-site well and at unknown levels in an off-site well. However, Radian Corporation analytical results list the substance as *2-piperidinone* at levels of 0.028 mg/L in the on-site well and at 0.030 mg/L in an "AG WELL" off site and downgradient of the waste pond area. WESTON was not able to determine the location of the downgradient well or the exact use of the well. None of the aforementioned substances are listed in EPA's Superfund Chemical Data Matrix or any health-based risk reference materials and analysis of said substances could not be compared against health-based benchmarks (7, 8, 9, 10).

WESTON conducted a drive by of the property. The Old Drew Plant property is composed of a single, dilapidated residence, what appeared to be a warehouse or plant, an office building, a water tower, an open paved area, and bare ground. The site is fully fenced. At this time, concrete pits were found to be filled with metal and wood debris. None of the sumps were visible from outside the fence line. The site currently operates under the name of Jack's Tractor Repair (11).

The Central Valley RWQCB, the Clovis office of the DTSC, the Tulare County Environmental Health Department, and the Tulare County Fire Department were all contacted. The Clovis office of the DTSC and the Tulare County Health Department sent all available files (12, 13, 14, 15).

### **3.0 Site and Hazard Ranking System Considerations**

**Groundwater:** Groundwater is encountered at a depth of 20 feet below ground surface in the area of the Old Drew Plant site. Groundwater in the area flows in the direction of the west/southwest. In 1984, The Tulare County Health Department issued closure of the on-site drinking water well based on findings of 2-piperidinone in drinking water. The property has since been sold and the well is currently being used for domestic purposes. The well was sampled in June of 2002 by the property manager on his own recognizance. The sample was submitted to the Tulare County Health Services Agency for bacteriological analysis only. No bacteriological contamination was found. Beyond 1984, no records were found documenting further sampling of the on-site well. There are 35 privately owned drinking water wells, including the on-site well, within 1 mile of the site. These wells are not tested for contaminants on a regular basis. The nearest municipal drinking water well is located 1.5 miles hydraulically crossgradient of the Old Drew Plant site. The well is operated by the City of Lindsay. The City of Lindsay operates one other drinking water well located approximately 5 miles to the north of the site. The water served to the City of Lindsay is a mix of 75% imported surface water and 25% groundwater (8, 11, 16, 17, 18, 19).

**Surface Water:** The nearest surface water body, the Friant Kern Canal, is located approximately 1.25 miles from the site. The canal is concrete lined and serves drinking and irrigation water to the communities of Lindsay and Strathmore. The canal is leveed and located in relatively flat terrain (20, 21).

**Soil Exposure and Air:** The site is located in a sparsely populated agricultural area. There are no residences, schools, day care facilities, or terrestrial sensitive environments on site. The on-site population is limited to approximately 10 workers (2).

### **4.0 References**

1. U.S. Environmental Protection Agency, Envirofacts Warehouse CERCLIS query results, [http://www.epa.gov/enviro/html/cerclis\\_query.html](http://www.epa.gov/enviro/html/cerclis_query.html), data extracted February 21, 2002.
2. Beatty, Larry, Central Valley Regional Water Quality Control Board, Inspection report of Old Drew Plant, December 23, 1983.
3. Keck, Gene, Wilsey Foods, Explanation of Old Drew Plant operations, August 17, 1983.
4. Pyle, Amy, Visalia Times Daily, Chemical Leak Feared at Old Lindsay Plant, Friday May 18, 1984.
5. White, Gerald, California Department of Health Services (DHS), Letter to Daniel Weisenberger, Owner of Old Drew Chemical Plant, December 5, 1984.
6. DHS, Facility Background Information, Old Drew Plant, September 30, 1983.
7. Pent-A-Vate, Inc., Results for soil and water analysis, Old Drew Plant, November 30, 1983.
8. Waters, Jim, Tulare County Environmental Health Department, Interoffice Memorandum to Don Johnson, November 21, 1984.
9. Radian Corporation, Analytical Results for Soil and Water Sampling at Drew Chemical site, June 1, 1984.
10. Merck & Co., Inc., The Merck Index, Eleventh Edition, Merck & Co. Inc. Publications, 1989.
11. Berner, Greg, and De Fao, Joe, WESTON, Site Reconnaissance Interview and Observations Report, May 9, 2002.
12. Medrano, Anthony, RWQCB, Telephone conversation recorded on Contact Report by Greg Berner, WESTON, March 5, 2002.
13. Doehring, Barabara, DTSC, Telephone conversation recorded on Contact Report by Greg Berner, WESTON, March 5, 2002.
14. Martin, Joel, Tulare County Environmental Health Department, Telephone conversation recorded on Contact Report by Greg Berner, WESTON, May 10 and May 17, 2002.
15. Alonzo, Diane, Tulare County Fire Department, Telephone conversation recorded on

Contact Report by Greg Berner, WESTON, March 10, 2002.

16. Central Sierra Environmental, Third Quarter Progress Report for the Purmax Oil Company Property, November 16, 2001.
17. Mcurdy, Tom, City of Lindsay, Telephone conversation recorded on Contact Report by Greg Berner, WESTON, March 7, 2002.
18. Denni, Job, Landmark Realty, Telephone conversation recorded on Contact Report by Greg Berner, WESTON, June 18 and July 3, 2002.
19. Denni, Job, Landmark Realty, Fax Transmittal of Analytical Data from June 19, 2002 Sampling of On-site Drinking Water Well, Tulare County Environmental Health Department, August 5, 2003.
20. Medders, Dennis, Lindsay/Strathmore Irrigation District, Telephone conversation recorded on Contact Report by Greg Berner, WESTON, March 7, 2002.
21. U.S. Geological Survey, Salida Quadrangle, California, 7.5 Minute Series (Topographic), Photorevised 1969.